

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Peregrine Fixed Income Limited (in liquidation),	:	Case No. 05-CV-4351 (RMB)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
JP Morgan Chase Bank (formerly known as The Chase	:	
Manhattan Bank and having merged with Morgan	:	
Guaranty Trust Company of New York),	:	
	:	
Defendant.	:	
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**SUPPLEMENTAL DECLARATION OF MICHAEL S. FELDBERG IN SUPPORT  
OF MOTION FOR LEAVE TO AMEND ANSWER AND FILE COUNTERCLAIMS**

MICHAEL S. FELDBERG, an attorney duly admitted to practice before the courts of the State of New York, hereby affirms under penalty of perjury as follows:

1. I am a member of the Bar of the State of New York and a partner with Allen & Overy LLP, attorneys for Defendant JPMorgan Chase Bank, N.A. ("JPMC") herein. I make this declaration to set before the Court documentary evidence and other competent proof in further support of JPMC's motion for leave to amend its answer to assert counterclaims against plaintiff.
2. A true copy the Form 8-K filed by First Chicago NBD Corp. on July 19, 1995 is attached as Exhibit 1.
3. A true copy of the Form 8-K filed by Bank One Corp. on October 6, 1998 is attached as Exhibit 2.
4. A true copy of the relevant portions of the transcript of the Deposition of Don Thompson dated November 30, 2005 is attached as Exhibit 3.

5. A true copy of the relevant portions of the transcript of the Deposition of Piers Murray dated December 6, 2005 is attached as Exhibit 4.

6. A true copy of the Expert Report of David F. DeRosa, Ph.D dated June 1, 2006 is attached as Exhibit 5.

7. A true copy of Plaintiff's Response to JPMorgan's Second Supplemental Request for Production of Documents, dated November 9, 2005, is attached as Exhibit 6.

8. A true copy of Plaintiff's Response to JPMorgan's Second Supplemental Set of Interrogatories, dated November 9, 2005, is attached as Exhibit 7.

9. A true copy of Plaintiff's Response to JPMorgan's Third Supplemental Request for Production of Documents, dated November 9, 2005, is attached as Exhibit 8.

10. A true copy of the relevant portions of the transcript of the Deposition of Simon Copley dated November 15, 2005 is attached as Exhibit 9.

Dated: New York, New York  
January 5, 2007

/s/ Michael S. Feldberg  
Michael S. Feldberg